

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SEATON INSURANCE COMPANY and
STONEWALL INSURANCE COMPANY,

Plaintiffs,

vs.

CAVELL USA INC. f/k/a KEN RANDALL
AMERICA, INC. f/k/a EASTGATE, INC.
and KEN RANDALL, individually,

Defendants.

Case No. 1:07-CV-07032 (RMB) (KNF)

MOTION TO ADMIT COUNSEL
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, John F. Finnegan, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Shawn L. Kelly, Esq.
Riker Danzig Scherer Hyland Perretti LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, New Jersey 07962-1981
Phone: (973) 451-8555
Fax: (973) 451-8670

Shawn L. Kelly, Esq. is a member in good standing of the Bar of the State of New Jersey. There are no pending disciplinary proceedings against Shawn L. Kelly, Esq. in any State or Federal court.

FILED
2007 DEC -4 11:54
S.D. OF N.Y.

10-4-07
SC# 806489

Dated: ~~November~~ ^{December 3} ____, 2007
New York, New York

Respectfully submitted,

By: 
John F. Finnegan (JFF-3336)

CADWALADER, WICKERSHAM & TAFT
LLP
One World Financial Center
New York, NY 10281
(212) 504-6000

Attorneys for Plaintiffs Seaton Insurance
Company and Stonewall Insurance Company

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SEATON INSURANCE COMPANY and
STONEWALL INSURANCE COMPANY,

Plaintiffs,

vs.

CAVELL USA INC. f/k/a KEN RANDALL
AMERICA, INC. f/k/a EASTGATE, INC.
and KEN RANDALL, individually,

Defendants.


Case No. 1:07-CV-07032 (RMB) (KNF)

**AFFIDAVIT OF JOHN F.
FINNEGAN IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

JOHN F. FINNEGAN, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Cadwalader, Wickersham & Taft LLP, counsel for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Shawn L. Kelly, Esq. as counsel *pro hac vice* to represent Plaintiffs in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1983. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Shawn L. Kelly, Esq. since ¹⁹⁹⁰~~2006~~. 

4. Mr. Kelly is a Partner at Riker Danzig Scherer Hyland Perretti LLP, Morristown, New Jersey.

5. I have found Mr. Kelly to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Shawn L. Kelly, Esq., *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Shawn L. Kelly, Esq., *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Shawn L. Kelly, Esq., *pro hac vice*, to represent Plaintiffs in the above-captioned matter, be granted.

Dated: ^{December 3} ~~November~~ ____, 2007
New York, New York

Respectfully submitted,

By: 
John F. Finnegan (JFF-3336)

CADWALADER, WICKERSHAM & TAFT
LLP
One World Financial Center
New York, NY 10281
(212) 504-6000

Attorneys for Plaintiffs Seaton Insurance
Company and Stonewall Insurance Company

Sworn to me before this
³⁰ day of December 2007


Notary Public

MAUREEN P. PERRY
Notary Public, State Of New York
No. 01PE6077965
Qualified In Kings County
Commission Expires July 22, 2008/10

Supreme Court of New Jersey

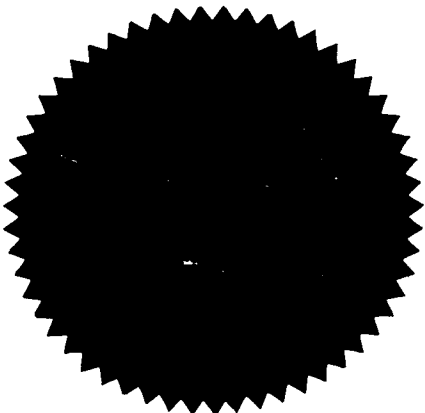


Certificate of Good Standing

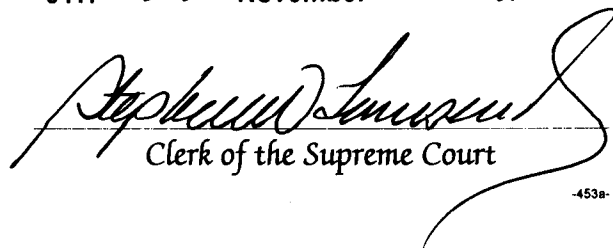
This is to certify that **SHAWN L KELLY**
(No. **013621978**) was constituted and appointed an Attorney at Law of New
Jersey on **December 06, 1978** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
9TH day of November , 20 07


Clerk of the Supreme Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SEATON INSURANCE COMPANY and
STONEWALL INSURANCE COMPANY,

Plaintiffs,

vs.

CAVELL USA INC. f/k/a KEN RANDALL
AMERICA, INC. f/k/a EASTGATE, INC.
and KEN RANDALL, individually,

Defendants.

Case No. 1:07-CV-07032 (RMB) (KNF)

ORDER

Upon motion of John F. Finnegan, attorney for Plaintiffs, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Shawn L. Kelly, Esq.
Riker Danzig Scherer Hyland Perretti LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, New Jersey 07962-1981
Phone: (973) 451-8555
Fax: (973) 451-8670

is admitted to practice *pro hac vice* for Plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:

City, State:

U.S.D.J./U.S.M.J

3811496.1

CERTIFICATION

A copy of the foregoing motion, Affidavit of John F. Finnegan, Certificate of Good Standing and proposed Order For Admission Pro Hac Vice are being served upon counsel for defendants via Federal Express this 32nd day of ~~November~~^{December}, 2007:

Ira G. Greenberg, Esq.
Vincent J. Vitkowsky, Esq.
EDWARDS ANGELL PALMER & DODGE LLP
750 Lexington Avenue, 8th Floor
New York, New York 10022
(212) 308-4411



John F. Finnegan